

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

Blitman Saratoga LLC,

Case No. 20-23177 (RDD)

Debtor.
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**DECLARATION OF DISINTERESTEDNESS
IN SUPPORT OF THE RETENTION OF
GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP
AS ATTORNEY TO THE DEBTOR**

Kevin J. Nash declares the following under penalties of perjury pursuant to 28
U.S.C. § 1746:

1. I am a member of the firm of Goldberg Weprin Finkel Goldstein LLP
("GWFG", or the "Firm"), which maintains offices at 1501 Broadway, New York, New York
10036.

2. I respectfully submit this Declaration in support of my Firm's proposed
retention as attorneys for the debtor, Blitman Saratoga LLC (the "Debtor"). I am admitted to
practice before this Court and believe that my firm is qualified to represent the Debtor herein.
The undersigned, along with J. Ted Donovan, are the attorneys who will bear the primary
responsibility for the representation of the Debtor.

3. Neither the Firm nor any member of the Firm holds an interest that would
disqualify GWFG from representing the Debtor in connection with the Chapter 11 case.

4. I have reviewed the schedules of creditors filed by the Debtor herein, and
my Firm does not and has never represented any of the creditors listed in the schedules. As such,
I believe the Firm is sufficiently disinterested within the meaning of the Bankruptcy Code to
serve as counsel.

5. I will bear primary responsibility for this Chapter 11 case. I have considerable experience in bankruptcy matters, having appeared in the Bankruptcy Courts for the Eastern and Southern Districts of New York on a consistent basis since 1984. My firm will perform the services delineated in the Debtor's supporting application.

6. Prior to the commencement of the Chapter 11 cases, my Firm received a retainer payment of \$20,000 plus \$2,000 for the filing fee and noticing expenses. The retainer was contributed as capital by Goren Bros. Limited Partnership, which is affiliated with Alex Goren and James Goren, who are the 50% beneficial members of the Debtor. James Goren is submitting a "Lar-Dan" declaration simultaneously herewith relating to this payment.

7. GWFG shall apply the unused portion of the retainer of approximately \$7,000 to compensation to be awarded herein.

8. As is customary, the Firm shall maintain individual time records to identify the particular services rendered on the Debtor's behalf, listing the attorney involved, and the task performed. The Firm's current billing rates for bankruptcy matters are \$575.00 per hour for partner time, and between \$275.00 to \$425.00 for associate time. In the event there are changes in the Firm's billing rates, notice will be providing in writing to the Debtor, the Court and the U.S. Trustee.

Dated: New York, New York
March 10, 2021

/s/ Kevin J. Nash, Esq.